

EXHIBIT H

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
IN RE

FRALEG GROUP, INC.,

Case No. 22-41410-jmm

Debtor.
-----X

RESPONSE BY DEBTOR TO TRUSTEE'S REQUEST
FOR PRODUCTION OF DOCUMENTS

Fraleg Group, Inc. (hereinafter "Debtor"), by its Officers and Shareholders, Andy Alege, Ron Fraser and Andre Juman, hereby responds to the Trustee's Request for the Production of Documents ("Trustee's Request") set forth in the Rule 2004 Subpoena as follows:

General Objections

1. These responses are made without waiving (and expressly reserving) Debtor's rights: (i) to object on any ground to the use of the information provided in this or any other proceeding; (ii) to object on any ground to the subject matter of the Trustee's Request; and (iii) to revise, correct, supplement or clarify any of the responses set forth herein at a later time. Debtor does not hereby admit, adopt or acquiesce in any factual or legal contention, assertion or characterization that is contained in the Trustee's Request.
2. Debtor reserves all objections as to relevance, authenticity or admissibility of any documents produced in response to Trustee's Request.
3. Each of Debtor's specific responses set forth below shall be deemed to incorporate, and shall not be deemed a waiver of, the foregoing General Objections.

Request No. 1:

Copies of the 2020, 2021, 2022 and final Federal and New York State Tax Returns for Fraleg Group, Inc. (the “Debtor”)

Response No. 1:

Enclosed is a copy of 2020 Federal and State Tax Return. The Debtor has not filed any subsequent tax returns.

Request No. 2:

Copies of the 2021, 2022, 2023 and 2024 Bank account statements for all accounts held by the Debtor, including copies of cancelled checks, deposits and wire transfers.

Response to No. 2:

The bank account for Bank of America was closed sometime in 2020. The Debtor will provide evidence of the closure of this account shortly.

Request No. 3:

Copies of all leases held by the Debtor

Response to No. 3:

The Debtor does not hold any leases

Request No. 4:

Copies of any and all business records for the Debtor from 2021 through 2023

Response to No. 4:

All business records for the Debtor were produced to the Trustee by prior counsel.

Request No. 5:

Copies of all documents pertaining to the Debtor’s purchase of the real property located at 116 North Walnut Street, East Orange, New Jersey, including but not limited to, a copy of the title report, transfer tax documents, all closing documents

Response to No. 5:

Enclosed is a copy of the closing documents for the purchase of the real property at 116 North Walnut Street, East Orange, New Jersey

Request No. 6:

List of all assets owned by the Debtor

Response to No. 6:

All assets owned by the debtor are reflected in Schedules A and B as filed with the Bankruptcy Court. Copies are provided here for your ready reference.

Request No. 7:

List of all of the Debtor's business premises

Response to No. 7:

The Debtor's business premises is 45 Main Street, Brooklyn, New York 11201

Request No. 8:

List of all Employees of the Debtor

Response to No. 8:

The Debtor has 3 employees (Andy Alege, Ron Fraser and Andre Juman)

Request No. 9:

List of accounts receivables/accounts payables for the debtor

Response to No. 9:

The Debtor has no accounts receivable. Any accounts payable are listed on Schedule D, E/F as filed with the Bankruptcy Court. A copy is provided here for your ready reference.

Request No. 10:

List of all businesses owned by Andy Alege, Ron Fraser and Andre Juman

Response to No. 10:

There are no businesses owned by Andy Alege, Ron Fraser or Andre Juman other than the Debtor

Request No. 11:

List of all businesses related to the Debtor

Response to No. 11:

There are no businesses related to the Debtor

Request No. 12:

Within the past six (6) years, a list of all leases that the Debtor has entered into and copies of said leases

Response to No. 12:

The only lease entered into by the Debtor is 45 Main Street, Brooklyn, NY 11201. A copy of said lease is enclosed herewith

State of New York }
 } ss:

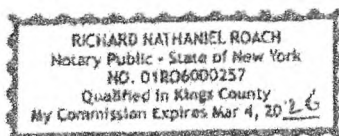
County of KINGS }

Subscribe and sworn to (or affirmed) before me this 13th
day of August, 2024, by Andy Alege

Richard Nathaniel Roach Notary Public (Seal)

Sworn to before me this
13th Day of August 2024

Richard Nathaniel Roach
Notary Public



Andy Alege
Ron Fraser
Andre Juman